

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>GAILEN LEE DAVID,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 1:22-cv-00287-RDA-IDD</b>
<b>v.</b>	)	
	)	
<b>En Pointe Productions LLC, <i>et al.</i></b>	)	
	)	
<b>Defendant.</b>	)	
	)	
	)	
	)	
	)	

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**MOTION TO ENFORCE SETTLEMENT AGREEMENT AND FOR SANCTIONS**

COME NOW, Defendants En Pointe Productions LLC, On It Media LLC, Robert Laurie, April Carter, Nicole Noya, More News Later Media LLC, Gorgon LLC, Deviant Entertainment LLC, and Nikki Nutrition LLC, pursuant to Fed. R. Civ. P. 7 and respectfully move the Court to enforce the settlement agreement signed by all parties to the above-captioned action, sanction Plaintiff, and award attorneys' fees. Defendants Joan Jones, Prestige Business Solutions LLC, Carrie Groenwold, Juan Albarran Marquez, and Kenneth Fields consent to the relief sought in this motion. The reasons for this Motion and support thereof are set forth in the accompanying Memorandum of Law In Support of Motion to Enforce Settlement Agreement and for Sanctions.

WHEREFORE, Defendants En Pointe Productions LLC, On It Media LLC, Robert Laurie, April Carter, Nicole Noya, More News Later Media LLC, Gorgon LLC, Deviant

Entertainment LLC, and Nikki Nutrition LLC respectfully move this Court to grant their Motion to Enforce Settlement Agreement, dismiss Plaintiff's Amended Complaint and this action with prejudice, award attorneys' fees to be withheld from the settlement payment to Plaintiff, and award any other award or relief that justice may require.

Respectfully submitted,

**THE PELS LAW FIRM**

Dated: June 20, 2022

/s/ Jon D. Pels

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*Laurie, April Carter, Nicole Noya, More*

*News Later Media LLC, Gorgon LLC,*

*Deviant Entertainment LLC, and Nikki*

*Nutrition LLC*